

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

OFC. CHRISTOPHER M. ZAMORA,

Plaintiff,

V.

CITY OF HOUSTON

Defendant.

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**C.A. NO. 4:07-CV-4510
(ON REMAND)**

PLAINTIFF'S WITNESS LIST

The following individuals have personal knowledge of relevant facts in this cause of action and **will** be called as a witness for trial:

1. Officer C. M. Zamora, may be reached through counsel
2. Lieutenant M. F. Zamora, Ph. D.
Assistant Professor
Center for Security Studies
Angelo State University
Member, Texas Tech University System
ASU Station #10922
San Angelo, TX 76909-0922
(325) 486-6686 (office)
Plaintiff's father; testify to the filing and allegations contained in December 20, 2007 EEOC complaint (and all amendments); testify to the filing and allegations contained in Cause No. 4:07-CV-4510; testify to the filing and allegations alleged in IAD # 36801-2010.
3. James Iglinsky Sergeant, Houston Police Department Legal Services
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Testify about the contents of Officer C. M. Zamora's IAD file and 3 x 5 (both public and private); testify about HPD policy and procedures as they relate to discipline, expunction of records, and record keeping; testify about policies and procedures as it relates to processing of employment records and files between various departments of the Houston Police Department.

4. Captain Michael Graham Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston, Legal Department
900 Bagby, Thrid Floor
Houston, TX 77002 (832) 393-6300
Captain Graham has knowledge about the facts of this case was the Commander of the Gang Unit.
5. Lieutenant Steven Casco Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston, Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300
Lieutenant Casco has knowledge about the facts of this case and works in the Crime Reduction Unit.
6. Sergeant Mark Myskowski Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston, Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300
Sergeant Myskowski has knowledge about the facts of this case and worked in the Crime Reduction Unit.
7. Sergeant Reid Cashdollar Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston, Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300
Sergeant Cashdollar has knowledge about the facts of this case and worked in the Crime Reduction Unit.
8. Lieutenant Tom Spjut, Investigator, Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney

City of Houston, Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Lieutenant Spjut has knowledge of internal affairs complaint # 36801-2010.

9. Sergeant D. Boggard, Investigator, Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston, Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Sergeant Boggard has knowledge of internal affairs complaint # 36801-2010.

10. Captain Mark Holloway Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston, Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Captain Holloway has knowledge and facts of the case and was the commander of the Central Division.

11. Executive Chief K.A. Munden, Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Assistant Chief Munden has knowledge regarding HPD policies and procedures and the facts of this case, he will serve as the Department's representative.

12. Captain Zera
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Captain Zera set on Administrative Disciplinary Committee ('ADC') responsible for making recommendations to the Chief of Police relating to Plaintiff's temporary suspension and finding of untruthfulness.

13. Sergeant Jodie Crawford
Houston Police Department
Central Patrol, Night Shift
1200 Travis Street
Houston, Texas 77002
Oversaw Plaintiff's involuntary transfer from CRU to Central; was Plaintiff's immediate superior at Central until May, 2012.
14. Melvin L. Tucker, MPA
5929 Fordland Drive
Raleigh, NC 27606
(919) 851-6860
(919) 851-6861 (fax)
Plaintiff's expert; see expert testimony report [Doc # 173, 185].
15. William B. Stewart Jr., CPA
7887 San Felipe St.
Houston, Texas, 77063
(713) 974-2928
bstewartcpa@aol.com
Plaintiff's expert; see expert testimony report [Doc # 172, 203].
21. Officer Josh Horn Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston, Legal Department
Bagby, Third Floor
Houston, TX 77002
(832) 393-6300
Officer Horn has knowledge about the facts of this case and works in the Crime Reduction Unit.

The following individuals have personal knowledge of relevant facts in this cause of action and **may** be called as witnesses for trial:

1. Deidre Harris, Staff Attorney, Houston Police Department Legal Services
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Ms. Harris has knowledge of HPD's policies and procedures as it relates to HPD Legal Services Unit and disseminating confidential information.

2. Sandra Robinson, Former Staff Attorney
Houston Police Department Legal Services
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300
Mrs. Robinson has knowledge of HPD's policies and procedures as it relates to HPD Legal Services Unit and disseminating confidential information.
3. Chad T. Hoffman
Houston Police Officer's Union
1600 State Street, Suite 200
Houston, Texas 77007
(832) 200-3420
Attorney at HPOU; represented Plaintiff in appeal of November 15, 2010 ten-day temporary suspension.
4. Bret Ligon, DA
207 W. Phillips, 2nd Floor
Conroe, Texas 77301
(936) 539-7800
(936) 760-6940 (fax)
Attorney at HPOU; represented Plaintiff during period of harassment at CRU; advised Plaintiff's of proper course of action while at the CRU.
5. Officer Michelle Mize, Houston Police Department
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300
Officer Mize has information regarding Plaintiff's damages.
6. Rita Zamora, City of Houston Administrative and Regulatory Affairs
c/o Shani A. Dennis, Assistant City Attorney
City of Houston, Legal Department
900 Bagby, Third Floor, Houston, TX 77002
(832) 393-6300

Testify about the contents of Officer C. M. Zamora's departmental file; testify about HPD policy and procedures as they relate to discipline, expunction of records, and record keeping; testify about policies and procedures as it relates to processing of employment records and files between various departments of the Houston Police Department.

7. Shelia Bailey
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Testify about the contents of Officer C. M. Zamora's official/personnel file; testify about HPD policy and procedures as they relate to discipline, expunction of records, and record keeping; testify about policies and procedures as it relates to processing of employment records and files between various departments of the Houston Police Department.

8. Alisa Franklin-Brooks Human Resources
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300

Testify about the contents of Officer C. M. Zamora's civil service file; testify about HPD policy and procedures as they relate to discipline, expunction of records, and record keeping; testify about policies and procedures as it relates to processing of employment records and files between various departments of the Houston Police Department.

9. Clint Greenwood, ADA
Harris County District Attorney's Office
1201 Franklin, Suite 600
Houston, Texas 77002-1923
(713) 755-5800

ADA with Harris County; declined to accept criminal charges on Plaintiff and Lieutenant M. F. Zamora; relates to IAD # 36801-2010.

10. Lieutenant Ken Miller
Central Division, Night Shift
1200 Travis Street
Houston, Texas 77002

Plaintiff's supervisor at Central; observed Plaintiff's work performance.

11. Sergeant Larry Mikel
Houston Police Department
Central Division, Night Shift
1200 Travis Street
Houston, Texas 77002
Plaintiff's supervisor at Central; observed Plaintiff's work performance.
12. Chief Charles McClland
c/o Shani A. Dennis, Assistant City Attorney
City of Houston Legal Department
900 Bagby, Third Floor
Houston, TX 77002
(832) 393-6300
Testify about discipline given by Officer C. M. Zamora's as a result of IAD # 36801-2010; testify about HPD policy and procedures as they relate to discipline, expunction of records, and record keeping; testify about procedures relating to investigations conducted by IAD; testify about policies and procedures as it relates to processing of employment records and files between various departments of the Houston Police Department; testify about polices as stated in the IAD Training Manuel; Corrective Action Manuel; 2001 and 2011 Meet and Confer Agreements
13. Custodian of Business Records
Texas Commission on Law Enforcement Standards and Education
6330 E Highway 290, Suite 200
Austin, TX 78723-1035
(512) 936-7700
14. Custodian of Business Records
Houston Police Officer's Union
1600 State Street
Houston, Texas 77007
713-237-0282
15. Custodian of Business Records
The 100 Club
1233 West Loop South, Suite 1250
Houston, Texas 77027
713-952-0100
16. Custodian of Business Records
Gloria M. Rincones
1325 Palm Boulevard, Suite C-2

Brownsville, Texas 78520
956-554-9558

17. Custodian of Business Records ticketstop.com
335 Pennbright Dr # 104
Houston, Texas 77090-5909
281-836-1050

12. Custodian of Business Records
Houston Police Department

Respectfully submitted,

THE OGG LAW FIRM

A handwritten signature in black ink, appearing to read 'K. Ogg', is written over a horizontal line.

KIM K. OGG
SBN: 15230200
R. SCOTT POERSCHKE
SBN: 24067822
3215 Mercer, Suite 100
Houston, Texas 77027
(713) 974-1600
(713) 621-2106 (fax)
kimogg@ogglawfirm.com
scott@ogglawfirm.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Witness List has been served upon the following by the method indicated:

Shani Ain Dennis
City of Houston
900 Bagby
PO Box 368
Houston, TX 77001
832-393-6300
Fax: 832-393-6259
Email: shani.dennis@houstontx.gov

Via the Southern District ECF system

Dated: July 11, 2013



KIM K. OGG